

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

Enma Duarte,

Plaintiff

v.

Aguaviva of Alexandria, Inc.
d/b/a Don Taco

and **Miguel A. Cordero,**

Defendants

Case No.: 1:21-cv-00507

JOINT STIPULATION OF DISMISSAL

Plaintiff, ENMA DUARTE, and Defendants, AGUAVIVA OF ALEXANDRIA, INC, and MIGUEL A. CORDERO, by and through their undersigned counsel, hereby agree and stipulate following the Court's approval of the parties' settlement agreement, Dkt. No. 16, and pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), that the entire action and all claims in Plaintiff's Complaint are hereby dismissed with prejudice as to future action, subject only to the Court's continuing jurisdiction to enforce the terms of the parties' settlement agreement under *Kokkonen v. Guardian Life Ins. of America*, 511 U.S. 375 (1994).

Agreed and stipulated this 3rd day of September 2021.

ENMA DUARTE
Plaintiff

By Counsel

//s//Rachel C. McFarland
Rachel C. McFarland (VSB No.: 89391)
rmcfarland@justice4all.org

Legal Aid Justice Center

1000 Preston Avenue, Ste A
Charlottesville, VA 22903
(434) 977-0553 / fax (434) 977-0558

Simon Sandoval-Moshenberg (VSB No.: 77110)

simon@justice4all.org

Kelly Poff Salzmman (VSB No.: 73884)

kelly@justice4all.org

Legal Aid Justice Center

6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
(703) 778-3450 / fax (703) 778-3454

Counsel for Plaintiff

AGUAVIVA OF ALEXANDRIA, INC

MIGUEL A. CORDERO

Defendants

By Counsel

James T. Bacon, Esq. (VSB# 22416)

Bret E.A. Giaimo, Esq. (VSB# 93515)

ALLRED, BACON, HALFHILL & YOUNG, P.C.

11350 Random Hills Rod, Ste 700

Fairfax, VA 22030

(703) 352-1300

(703) 352-1301 - Fax

jbacon@abhylaw.com

Counsel for Defendants

Certificate of Service

I, the undersigned, hereby certify that on this date, I uploaded a copy of the foregoing, as well as all attachments thereto, to this court's CM/ECF system, which will cause a Notice of Electronic Filing (NEF) to be sent to counsel for Defendants:

James T. Bacon, Esq. (VSB# 22416)

Bret E.A. Giaimo, Esq. (VSB# 93515)

ALLRED, BACON, HALFHILL & YOUNG, P.C.

11350 Random Hills Rod, Ste 700

Fairfax, VA 22030
(703) 352-1300
(703) 352-1301 - Fax
jbacon@abhylaw.com
Counsel for Defendants

//s//Rachel C. McFarland
Rachel C. McFarland (VSB No.: 89391)
rmcfarland@justice4all.org
Legal Aid Justice Center
1000 Preston Avenue, Ste A
Charlottesville, VA 22903
(434) 977-0553 / fax (434) 977-0558